Tri-Party Agreement

Change Notice for Modifying Approved Documents/ Workplans
In Accordance with the Tri-Party Agreement Action Plan,
Section 9.0, *Documentation and Records*

Change Number	Document Submitted Under Tri-Party Agreement Milestone	Date:
TPA-CN-155	N/A	3/08/2006

Document Number and Title:	Date Document Last Issued:
DOE/RL-99-89 Rev. 1, Remedial Design Report and Remedial Action Work Plan for the K Basins Interim Remedial Action	**December 6, 2001**

Originator:	Phone:
G.B. Chronister/D.J. Watson KBC D&D/FH Environmental Protection	509/373-3250

Description of Change: Describe changes to the remedial design pertaining to debris removal from the K Basins.

Ellen B. Dagan (RL) and Larry E. Gadbois (Lead Regulatory Agency) agree that the proposed change modifies an approved workplan/document and will be processed in accordance with the Tri-Party Agreement Action Plan, Section 9.0, *Documentation and Records*, and not Chapter 12.0, *Changes to the Agreement.*

See attached 3 Pages Entitled Change Notice TPA-CN-155, PACKAGING AND REPACKAGING OF DEBRIS

Justification and Impacts of Change:

Debris removed from underwater in the 105-K East and 105-K West Basins is staged in CERCLA waste accumulation areas prior to shipment to disposal. Some debris requires repackaging to satisfy on site transportation requirements. For example numerous plywood boxes (4'X4'X3') filled with fuel canisters from the K Basins are currently staged outside in CERCLA waste accumulation areas and will require repackaging to meet shipping requirements prior to transporting for disposal..

The nature of the changes described below when screened against the ROD are minor or nonsignificant in nature as these changes do not impact the requirements of the ROD or the functional requirements of the design, i.e. remove sludge/debris from the K Basins. These changes do not alter the overall cleanup approach presented in the ROD.

The nature of these changes when screened against the direction provided in TPA Section 9.3, Document Revisions, do not affect the overall intent of the earlier design and do not require a full revision of the earlier RDR/RAWP.

Approvals:

Ellen B. Dagan RL Unit Manager*	3/21/06 Date	✓ Approved	__ Disapproved	
Larry Gadbois Lead Regulatory Unit Manager*	3-21-06 Date	✓ Approved	__ Disapproved	

*Send approved form to FH TPAI, A4-25, and the Administrative Record, H6-08

CHANGE NOTICE TPA-CN-055
K BASINS INTERIM REMEDIAL ACTION
PACKAGING AND REPACKAGING OF DEBRIS OUTSIDE OF K BASINS

This Change Notice identifies changes to the remedial design for the packaging and repackaging of debris outside of the K Basins that was removed from the K Basins to support shipment to disposal.

The nature of these changes when screened against the ROD appear to be minor or non-significant in nature as these changes do not impact the requirements of the ROD or the overall cleanup approach presented in the ROD.

These changes are discussed as follows:

1.0 Packaging and Repackaging of Debris Outside of K Basins

Debris removed from the water in the 105-K East and 105-K West Basins (i.e. K Basins) is sprayed with a fixative or wrapped in plastic and placed into waste containers. These waste containers are then staged in designated CERCLA waste accumulation areas prior to shipment to disposal, e.g. Environmental Restoration Disposal Facility (ERDF). In certain instances some of these containers will not meet on site shipping requirements for transporting debris for disposal. Therefore some of this debris requires repackaging.

> For example, there is approximately 130 plywood boxes (4'X4'X3') filled with fuel canisters wrapped in plastic that were removed from the K Basins that require repackaging into IP-2 containers (a DOT class of shipping container for low specific activity (LSA) material). The IP-2 containers were selected due to their large size and integrity. Each of these containers will hold up to 16 of the canister boxes. These boxes can be placed into the IP-2 waste containers relatively quickly as compared to removing their contents and placement of the canisters individually in the IP-2 containers, thereby reducing overall radiological exposure to the workers.
>
> Once a box is placed into an IP-2 container, the lid will be removed thereby allowing grout to fill the void spaces upon receipt at the ERDF site. The canister boxes will be placed in the IP-2 container in a stored configuration of two wide, four long, by two high.

All repackaging work will take place in designated CERCLA waste accumulation areas. Tarp material will be placed on the ground for purposes of contamination control. Work within this area will be controlled as a Contamination Area and the ground upon which the tarp will be placed will be surveyed prior to and following conclusion of any outdoor repackaging effort.

2.0 ARAR Analysis Associated With The Changes

This section identifies the Applicable or Relevant and Appropriate Requirement (ARAR) or To-Be-Considered (TBC) information listed in the K Basins Interim Remedial Action ROD and its amendment and how it will be met during packaging and repackaging of debris outside the K Basins.

2.1 WAC 246-247, "Radiation Protection Air Emissions", CFR Part 61, "National Emissions Standard for Hazardous Air Pollutants", and WAC 173-480, "Ambient Air Quality Standards and Emission Limits for Radionuclides."

Applicability

Applicable to those phases of the remedial action where dispersal of radioactive contaminants to the environment may occur..

Substantive Requirements

- Airborne emissions from K Basins activities shall not cause the cumulative site emissions to exceed the site public dose limit of 10-mrem/year effective dose equivalent. (The limit applies to total emissions from the Hanford Site.)
- Apply best available radionuclide control technology (BARCT).
- Monitor as appropriate.

Administrative and Engineering Controls

When packaging or repackaging debris outside of K Basins where dispersal of radioactive contamination to the environment is possible, the following controls will be used:

- Airborne emissions from K Basins activities shall not cause the cumulative site emissions to exceed the site public dose limit of 10-mrem/year effective dose equivalent. (The limit applies to total emissions from the Hanford Site.
  - The off site effect of diffuse and fugitive emissions from Hanford are included in annual site wide emissions reports.

- Apply BARCT
  - As debris waste containers are opened, provisions shall be in place for applying a fixative material to the debris if it discovered that the plastic wrapping on the debris has been torn or fixatives that were previously applied have been removed exposing the bare surface of the debris.
  - All repackaging activities will be performed in ambient air conditions with a requirement for cessation of activities with speeds of greater than 15 mph.

- Monitor as appropriate
  - As debris is packaged and repackaged outside, monitoring will be conducted by the existing near field ambient air monitors surrounding the K Basins (see attached figure).

Locations of Near-Field Monitoring Locations.